

REMARKS

Reconsideration of the present application is respectfully requested in view of the following remarks. Prior to entry of this response, Claims 1-24 were pending in the application, of which Claims 1 and 10 are independent. In the Final Office Action dated July 27, 2006, Claims 1-24 were rejected under 35 U.S.C. § 103(a). Following this response, Claims 1-29 remain in this application, Claims 2-4, 11, and 15 being canceled without prejudice or disclaimer and Claims 25-29 being added by this Amendment. Applicants hereby address the Examiner's rejections in turn.

I. Interview Summary

Applicants thank Examiner Tran for the courtesy of a telephone interview on September 5, 2006, requested by the undersigned to discuss the rejection of the current claims under 35 U.S.C. § 103(a). During the interview, Applicants asserted that the cited references at least do not teach or suggest the subject matter of the claims as amended. While the Examiner was positive, no agreement was made regarding patentability.

II. Rejection of the Claims Under 35 U.S.C. § 103(a)

In the Final Office Action dated July 27, 2006, the Examiner rejected Claims 1-19 and 23-24 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Published Application No. 20040205644A1 ("*Shaughnessy*") in view of "XLinkProxy: External Linkbases with XLink" ("*Paolo*") further in view of U.S. Patent Published Application No. 20030030645A1 ("*Ribak*"). Claims 1 and 10 have been amended, and Applicants

respectfully submit that the amendments overcome this rejection and add no new matter.

Amended Claim 1 is patentably distinguishable over the cited art for at least the reason that it recites, for example, "wherein displaying the placeholder further comprises, determining a text identifying a name for the one or more of the markup language tags associated with the placeholder, the text identifying the name being defined in one of the following: a schema library and a configuration file, determining whether a user-defined text string has been previously defined by a user, setting the placeholder equal to the user-defined text if it was determined that the user-defined text string has been previously defined by the user, and setting the placeholder equal to the text identifying the name for the one or more of the markup language tags associated with the placeholder if it was determined that the user-defined text string has not been previously defined by the user." Amended Claim 10 includes a similar recitation.

Support for these amendments can be found in the specification at least on page 2, line 29 through page 3, lines 8.

In contrast, *Shaughnessy* at least does not teach or suggest the aforementioned recitation from Claim 1. For example, *Shaughnessy* merely discloses a web browser way of creating and designing forms. (See paragraph [0215], lines 1-3.) A browser user may, using QuickPlace and interacting with a QuickPlace user interface, create a form as an object of the QuickPlace and select and create fields for that form. (See paragraph [0215], lines 3-6.) The browser user in *Shaughnessy* can create Microsoft Office documents from within QuickPlace, such as a new Excel web sheet. (See paragraph [0216], lines 1-3.) QuickPlace will automatically launch Excel, and when

Excel is closed, QuickPlace will bring in the Excel spread sheet. (See paragraph [0216], lines 3-6.) In *Shaughnessy*, it is not taught or suggested that, if a user-defined placeholder is available for an empty tag, the user-defined text is displayed as the placeholder rather than the tag name. Rather *Shaughnessy* is completely silent regarding this feature.

Furthermore, *Paolo* does not overcome *Shaughnessy*'s deficiencies. *Paolo* merely discloses a World Wide Web linking model. (See Abstract, page 57, line 1 col. 1.) In *Paolo*, after a number of problems associated with certain situations are resolved, a link is added to a document. The situations comprise problems in counting, problems in nested links, and overlapping anchors. (See page 61.) Nowhere in *Paolo* does it suggest or disclose determining if a user-defined placeholder is available for an empty tag, much less displaying user-defined text as the placeholder rather than a tag name based on the determination. Like *Shaughnessy*, *Paolo* at least does not teach or suggest, if a user-defined placeholder is available for an empty tag, the user-defined text is displayed as the placeholder rather than the tag name. Rather *Paolo* is completely silent regarding this feature.

Moreover, *Ribak* does not overcome *Shaughnessy*'s and *Paolo*'s deficiencies. *Ribak* merely discloses that a method for visualizing data includes receiving code representing content for display on a computer screen, the content including at least one hyperlink to other content and at least one attribute associated with the hyperlink. (See Abstract, lines 1-4.) User preferences are set in *Ribak* for each attribute. (See Abstract, lines 4-5.) The content is displayed on the screen, and at least one of the hyperlinks is hidden in response to the combination of user preference for that attribute.

(See Abstract, lines 5-8.) Like *Shaughnessy* and *Paolo, Ribak* at least does not teach or suggest, if a user-defined placeholder is available for an empty tag, the user-defined text is displayed as the placeholder rather than the tag name. Rather *Ribak* merely teaches, in response to a combination of user preference for an attribute, hiding a hyperlink.

Combining *Shaughnessy* with *Paolo* and *Ribak* would not have led to the claimed invention because *Shaughnessy, Paolo, and Ribak*, either individually or in combination, at least do not disclose or suggest “wherein displaying the placeholder further comprises, determining a text identifying a name for the one or more of the markup language tags associated with the placeholder, the text identifying the name being defined in one of the following: a schema library and a configuration file, determining whether user-defined text string has been previously defined by a user, setting the placeholder equal to the a user-defined text if it was determined that the user-defined text string has been previously defined by the user, and setting the placeholder equal to the text identifying the name for the one or more of the markup language tags associated with the placeholder if it was determined that the user-defined text string has not been previously defined by the user,” as recited by amended Claim 1. Amended Claim 10 includes a similar recitation. Accordingly, independent Claims 1 and 10 each patentably distinguishes the present invention over the cited art, and Applicants respectfully request withdrawal of this rejection of Claims 1 and 10.

Dependent Claims 5-9, 12-14, and 16-24 are also allowable at least for the reasons described above regarding independent Claims 1 and 10, and by virtue of their respective dependencies upon independent Claims 1 and 10. Accordingly, Applicants

respectfully request withdrawal of this rejection of dependent Claims 5-9, 12-14, and 16-24.

III. New Claims

Claims 25-20 have been added to more distinctly define and to round out the protection for the invention to which Applicants are entitled. Applicants respectfully submit that these claims are allowable over the cited art and that they add no new matter.

IV. Conclusion

Applicants respectfully request that this Amendment After Final be entered by the Examiner, placing the claims in condition for allowance. Applicants respectfully submit that the proposed amendments of the claims do not raise new issues or necessitate the undertaking of any additional search of the art by the Examiner, since all of the elements and their relationships claimed were either earlier claimed or inherent in the claims as examined. Therefore, this Amendment should allow for immediate action by the Examiner.

Finally, Applicants respectfully submit that the entry of the Amendment would place the application in better form for appeal, should the Examiner dispute the patentability of the pending claims.

In view of the foregoing remarks, Applicants respectfully submit that the claimed invention, as amended, is neither anticipated nor rendered obvious in view of the prior art references cited against this application. Applicants therefore request the entry of

this Amendment, the Examiner's reconsideration and reexamination of the application, and the timely allowance of the pending claims.

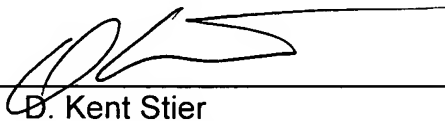
In view of the foregoing, Applicants respectfully submit that the pending claims, as amended, are patentable over the cited references. The preceding arguments are based only on the arguments in the Official Action, and therefore do not address patentable aspects of the invention that were not addressed by the Examiner in the Official Action. The claims may include other elements that are not shown, taught, or suggested by the cited art. Accordingly, the preceding argument in favor of patentability is advanced without prejudice to other bases of patentability. Furthermore, the Final Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Final Office Action.

Please grant any extensions of time required to enter this amendment and charge any additional required fees to our Deposit Account No. 13-2725.

Respectfully submitted,

Dated: October 27, 2006

By: _____


D. Kent Stier
Reg. No. 50,640

Merchant & Gould
P.O. Box 2903
Minneapolis, Minnesota 55402-9946
Telephone: 404.954.5066



DKS:mdc